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March 26, 2020

VIA ECF

Hon. Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: ***Michael Grecco Productions, Inc. v. Alamy Inc. et al***, 18-cv-3260-PKC-JO
Letter Motion for Extension of Time to File Amended Answer

Dear Judge Chen:

This firm is counsel to defendants Alamy Inc. (“US Alamy”) and Alamy Ltd. (“UK Alamy,” together with US Alamy, “Defendants”) in the above-captioned proceeding. We write pursuant to Your Honor’s Individual Rule 1.G to request that the Court retroactively extend Defendants’ time to file its Amended Answer and the Corporate Disclosure Statement of UK Alamy from Monday, March 23, 2020 to Friday, March 27, 2020. Plaintiff Michael Grecco Productions, Inc. consents to the request.

Defendants apologize for the belated submission of this request and their Amended Answer (and for any inconvenience it may have caused the Court), which is due to a clerical error whereby the date calendared for the filing was erroneously entered as tomorrow, Friday, March 27, 2020. Defendants’ counsel only realized the oversight today, whereupon they immediately submitted this request and called Your Honor’s chambers.

There have been no previous requests for an extension of this deadline. The deadline originally set for Defendants to file their Amended Answer was February 15, 2020. On February 13, 2020, Your Honor extended this deadline to March 23, 2020 *sua sponte*. This request does not impact any other deadlines in this case.

We greatly appreciate your Honor’s time and consideration of this matter.

Respectfully submitted,

/s/ Nancy E. Wolff

Nancy E. Wolff

cc: All counsel of record (via ECF)